

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433 (JRT/DJF)

**LINDELL MANAGEMENT LLC'S
RESPONSE TO REQUESTS FOR
PRODUCTION OF DOCUMENTS
IN AID OF EXECUTION**

Pursuant to Federal Rules of Civil Procedure 26, 34, and 69, Judgment Debtor Lindell Management LLC, as and for its responses to Robert Zeidman's Requests for the Production of Documents in Aid of Execution, states as follows:

GENERAL OBJECTIONS

1. The following responses are made without in any way waiving or intending to waive:

- a. All questions as to competency, relevancy, materiality, privilege, and admissibility as evidence of these responses or their subject matter for any purpose, in any subsequent proceeding in this or any other action;
- b. The right to object to the use of any said responses, or their subject matter, in any subsequent proceeding in this or any other action;
- c. The right to object on any ground at any time to a demand for further response to these or any other document requests or other discovery procedures involving or relating to the subject matter of these document requests; and
- d. The right, at any time, to revise, correct, add to, or clarify any objections

or responses.

2. Judgment Debtor objects to each and every request to the extent it seeks to discover information protected by the work product doctrine or attorney-client privilege, as defined by statute, rule, or common law.

3. Judgment Debtor objects to each and every request to the extent that it seeks information that is not relevant to the subject matter of the action or is not reasonably calculated to lead to the discovery of admissible evidence.

4. Judgment Debtor objects to each and every request to the extent that it is unreasonably cumulative or duplicative, seeks information already in the possession of Mr. Zeidman, or is obtainable from a source that is more convenient, less burdensome, or less expensive than Judgment Debtor.

5. Judgment Debtor objects to each and every request, definition, or instruction, to the extent they seek to impose obligations on Judgment Debtor beyond the requirements of the Federal Rules of Civil Procedure.

6. Judgment Debtor objects to each and every request to the extent it mischaracterizes evidence, is phrased in a manner that makes the request impossible to understand or answer, and to the extent it is misleading, argumentative, or otherwise improper as to form.

7. Judgment Debtor objects to the definitions and instructions used by Mr. Zeidman to the extent they are vague, ambiguous, compound, or are otherwise inaccurate.

8. Judgment Debtor reserves the right to rely upon additional information uncovered in its continuing investigation of this matter, and to supplement its discovery objections and responses accordingly.

RESPONSES

1. All documents concerning the nature of your business during the relevant time period, including but not limited to:
 - a. Documents identifying the name and address of your business.
 - b. Articles of incorporation or organization, partnership and/or joint venture agreements, charters, bylaws, corporate minute books, and other documents concerning the formation of any business entity in which you owned an interest, either directly or indirectly, during the relevant time period.
 - c. Documents identifying all shareholders, directors, officers, partners, members, managers, or other owners or operators of any business entity in which you owned an interest, either directly or indirectly, during the relevant time period.
 - d. Documents identifying the name, address, and state of incorporation or organization of any parent, subsidiary, division, general partner, joint venturer, or affiliate of any business entity in which you owned an interest, either directly or indirectly, during the relevant time period.

RESPONSE: The following responsive documents are being produced herewith: Operating Agreement, Certificate of Formation, Articles of Organization, and EIN letter. Lindell Management is a single-member LLC and has never had any members but Mike Lindell. It has no other members, officers, directors, or subsidiaries.

2. All documents concerning your revenue during the relevant time period, including but not limited to:
 - a. Documents evidencing all sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, payments on accounts receivable, commissions, agency fees, loan repayments, rents, royalties, license fees, dividends, distributions, payments concerning sales of assets, equipment, or inventory, payments on contracts, or any other payment or remuneration you received in connection with the operation of your business.
 - b. State and federal income tax returns, and all related forms and schedules (including all amended returns, forms, and schedules) filed during or concerning the relevant time period.
 - c. Financial statements, balance sheets, income statements, cash flow statements,

and loan applications prepared or submitted by you or on your behalf during the relevant time period.

RESPONSE:

With respect to Request 2a: Lindell Management's primary book of entry is QuickBooks. Bank statements are its secondary book of entry. Produced herewith is the QuickBooks database for Lindell Management, bank statements from February 2020 through the July 2024, and an Excel spreadsheet explaining each transaction through February 22, 2024.

With respect to Request 2b: Debtor is a single-member LLC. Its revenue is reported for tax purposes on Mr. Lindell's Schedules C for years 2019 through 2023, which are being produced herewith. These returns may be under internal and/or external audit.

With respect to Request 2c: Lindell Management does not produce financial statements in the ordinary course of its business, with the exception of tax statements. Lindell Management has never made a loan application.

3. All documents concerning your assets during the relevant time period.

RESPONSE: Preparation of these responses revealed that an erroneous entry had been made in depreciation schedules showing that a real estate holding had been booked to Lindell Management when it had, in fact, been purchased MyStore Studios, LLC. Lindell Management is producing depreciation schedules for the years 2019 through 2022. These schedules may be under internal and/or external audit.

4. All documents identifying your routine expenses, including but not limited to: operating costs; rental obligations; payroll and benefits; outstanding loans; installment payments; mortgage payments; loan payments and financing charges on vehicles, equipment, and supplies; payments due under contracts; royalty payments and license fees; commissions owed to brokers, dealers, or representatives; legal, accounting, and other professional fees; advertising and marketing costs; and other routine debts and expenses that occur on a regular basis.

RESPONSE: Lindell Management's QuickBooks database is being produced herewith.

5. All documents concerning any debts you owed or incurred during the relevant time period, including but not limited to:

- a. Documents identifying the name of the creditor, the amount owed, when the debt was incurred and for what reason, whether all or any portion of the debt was paid, when all or any portion was paid, and any remaining balance on all such debts.
- b. Documents on which each such debt is based, including contracts, bills, invoices, statements, agreements, mortgages, loan agreements, and all correspondence and other documents comprising, memorializing, or evidencing communications concerning each such debt.
- c. Documents concerning or evidencing any payment you made on any such debts.

RESPONSE: It is not in the nature of Lindell Management's ordinary course of business to hold debt. The only extant debt is to Mike Lindell, Mike Lindell Products LLC (DBA MyStore), and My Pillow as indicated in Lindell Management's interrogatory responses. Lindell Management's QuickBooks database is being produced herewith.

6. Documents concerning any effort to collect any debt from you by any creditor, collection agency, attorney, or other party acting on behalf of any creditor, including demand letters, default notices, forbearance agreements, collection letters, liens, lis pendens, lawsuits, judgments, petitions, complaints, summonses, or other legal process.

RESPONSE: None.

7. All documents concerning any real property you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including any and all: real estate contracts (purchase or sale; deeds; appraisals; leases; licenses; easements; rights of way; trusts; liens, mortgages, deeds in trust, or other encumbrances; escrow agreements; and other documents concerning any such ownership interest.

RESPONSE: None. There have been no real estate holdings.

8. All bank statements or other account statements for any account which you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, at any bank, brokerage, investment firm, or other financial institution.

RESPONSE: See response to Request 2a.

9. All communications concerning any account identified in response to Request No. 8 above.

RESPONSE: Lindell Management objects to this request as overbroad, unduly burdensome, vague, and seeking irrelevant information. Subject to and without waiving its objections, and construing this Request to call for communications with the relevant banks regarding the bank accounts identified in the bank statements produced herewith, Lindell Management states that no communications other than routine communications have occurred.

10. All documents concerning vehicles, aircrafts, boats, or other water vessels you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including but not limited to:

- a. Titles, licenses, and registrations.
- b. Sales contracts, bills of sale, and other documents concerning your purchase or ownership of the vehicle, aircraft, boat, or water vessel.
- c. Financing documents, loan documents, security agreements, and all other evidence of any other party's lien on or interest in the vehicle, aircraft, boat, or water vessel.
- d. Documents concerning or evidencing the location of the vehicle, aircraft, boat, or water vessel.

RESPONSE: None.

11. All documents concerning any and all other tangible corporate property with a value over \$5,000 which you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including but not limited to: goods; equipment and machinery; inventory; trade fixtures; tools; office equipment and furniture; computer equipment and networks; furnishings, appliances, electronics, computer equipment, televisions, stereos, audiovisual equipment, and fixtures; jewelry, artwork, antiques, and collectibles; clothing; cash; precious metals; appraisals, invoices, bills of sale, and other documents concerning or evidencing the value, purchase, receipt, possession, or ownership of any such tangible personal property; and all documents concerning or evidencing any other party's interest in or claim to any of your tangible personal property, including all debts or liabilities secured by, or liens, security interests, or other encumbrances in, on, or against the property.

RESPONSE: None.

12. Documents sufficient to identify all of your affiliates, subsidiaries, parent companies, or any other company that has or claims an interest in Lindell Management LLC, including the name, address or location, and state or country of incorporation or organization of any such entity, and the nature of your affiliation or corporate or other organizational relationship with any such entity.

RESPONSE: Lindell Management has never had any subsidiaries and has only ever had one member.

13. All documents concerning any corporation, subsidiary, limited liability company, trust, partnership, or other business entity of any kind or nature in which you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or in which you owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including but not limited to:

- a. Articles of incorporation or organization, charters, bylaws, partnership agreements, shareholder agreements, or other formational documents evidencing the existence of the entity.
- b. All stock certificates or other documents concerning or evidencing your ownership of shares, units, membership interests, partnership interests, or other ownership interest in the entity.
- c. Corporate minute books, minutes of organizational meetings, or documents concerning or evidencing the entity's organization, ownership, managerial structure, and adherence to corporate or other organizational formalities.
- d. Appraisals, valuations, and other documents concerning or evidencing the value of your ownership interest in any such entity.

RESPONSE: Lindell Management has never had any subsidiaries and has only ever had one member.

14. All documents concerning any and all intangible property with a value over \$5,000 you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, including but not limited to any and all: contracts; security agreements; stocks, bonds, or other evidence of ownership, equity, or investment in any business entity; patents, copyrights, trademarks, or other evidence of intellectual property rights; accounts receivable; notes receivable; corporate goodwill; research and development; retirement, pension, 401(k), and IRA accounts; annuities; crypto currency; and all documents concerning or evidencing any other party's interest in or claim to any of

your intangible personal property, including all debts or liabilities secured by, or liens, security interests, or other encumbrances in, on, or against the property.

RESPONSE: None.

15. All documents concerning policies of insurance you currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or were covered under during the relevant time period, including but not limited to any and all policies, contracts, notices, amendments, modifications, and renewals of any such policy.

RESPONSE: None.

16. If you claim that any of your revenue, income, or assets are exempt from collection, all documents evidencing the basis for such exemption.

RESPONSE: None.

17. Documents concerning any and all debts or liabilities owed to you by third parties, including, but not limited to, all claims, causes of action, lawsuits, judgments, or liens you now have or had at any time during the relevant time period against any third party.

RESPONSE: None.

18. All documents concerning or evidencing any third party's possession, ownership, or control of any of your assets, in whole or in part, including but not limited to:

- a. Contractual agreements, including all drafts and markups.
- b. Certificates of title or deeds.
- c. Publicly filed documents concerning the third party's possession or ownership interest.
- d. Correspondence, internal memoranda, notes, or other records concerning the third party's possession or ownership interest.

RESPONSE: None.

19. All documents concerning or evidencing any transaction in which you transferred any interest in any of your assets over the value of \$5,000, in whole or in part, to any transferee during the relevant time period, including but not limited to:

- a. Contractual agreements, including all drafts and markups.
- b. Certificates of title or deeds.
- c. Publicly filed documents concerning the transaction.
- d. Correspondence, internal memoranda, notes, or other records concerning the transaction.

RESPONSE: None.

20. All documents you provided to any transferee in connection with any due diligence they conducted before engaging in any transaction identified in Request No. 19 above.

RESPONSE: None.

Dated: August 23, 2024

/s/ Thomas F. Miller

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